

COLLEGE OF THE HOLY CROSS
Defendant

C.A. No.: 11-cv-11541

The parties jointly request that the schedule in this case be extending by (i) moving the close of fact discovery from April 30, 2012 to July 30, 2012; and (ii) extending the deadlines for subsequent events by the same time period. As grounds, the parties state that they are making good faith efforts to complete discovery but need additional time in order to properly prepare their cases. In particular, the parties have conducted three depositions but there remain several outstanding.

Respectfully Submitted,
COLLEGE OF THE HOLY CROSS.
By their attorneys,

/s/ Emily E. Smith-Lee

Emily E. Smith-Lee (BBO#634223)
eslee@smithleelaw.com
Beth M. Nussbaum (BBO#633878)
bnussbaum@slnlaw.com
Smith Lee Nebenzahl LLP
One Post Office Square
Sharon, MA 02067
(781)784-2322

/s/ Harold W. Potter, Jr.

Harold W. Potter, Jr. (BBO #404240)
harold.potter@hklaw.com
Katrina Chapman (BBO #676177)
katrina.chapman@hklaw.com
HOLLAND & KNIGHT LLP
10 Saint James Avenue
Boston, MA 02116
(617) 523-2700

Dated: April 26, 2012

3

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent by electronic mail to the following individuals on April 26, 2012:

Harold W. Potter, Jr. (BBO #404240)

harold.potter@hklaw.com

Katrina Chapman (BBO #676177)

katrina.chapman@hklaw.com

HOLLAND & KNIGHT LLP

10 Saint James Avenue

Boston, MA 02116

(617) 523-2700

Counsel for Defendant College of the Holy Cross

/s/ Emily S. Smith-Lee